

Exhibit 2 to the Complaint.

U.S. Patent No. US 7,650,376 v. Warner Bros. Discovery, LLC
Exemplary Claim of Infringement, Claim 37

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1. Claim Chart

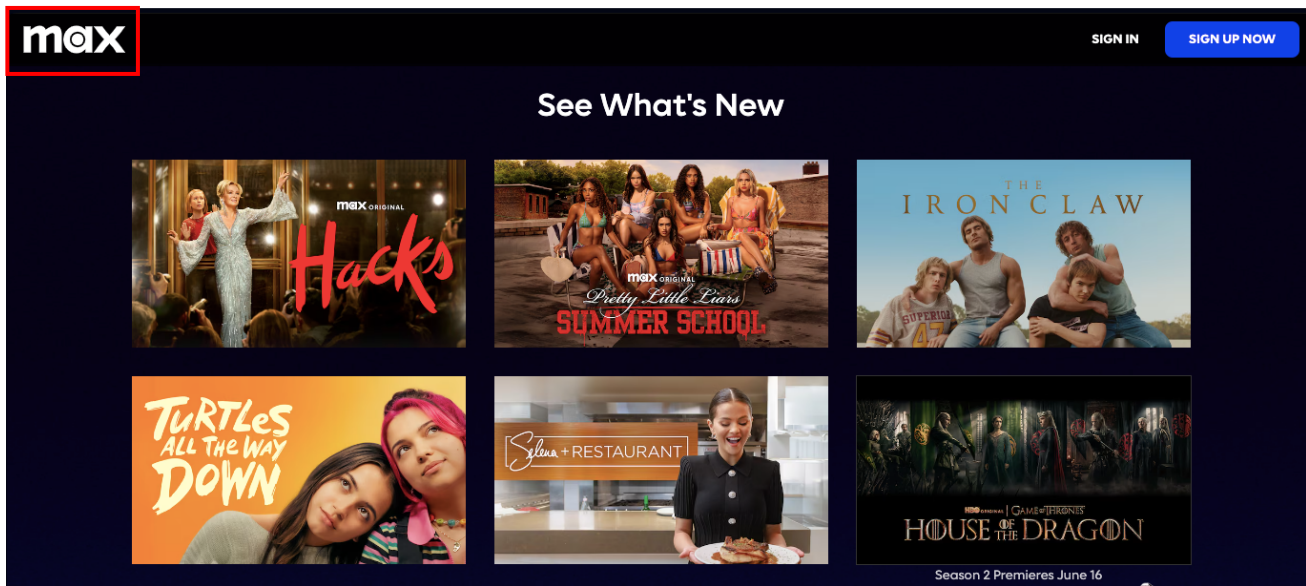
Claim	Analysis
<p>[37.P] A computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network, comprising:</p>	<p>Warner Bros. Discovery LLC (“Company”) makes, uses, sells and/or offers to sell a computer-readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides Max streaming platform ("computer-readable storage medium or media encoded with one or more computer programs”), that allows users to watch movies, series, sports, and games over the internet ("effecting the provision of content over a network").</p>  <p>The screenshot shows the Max streaming platform interface. At the top left is the 'max' logo. To the right are 'SIGN IN' and 'SIGN UP NOW' buttons. Below the header is a 'See What's New' section featuring a grid of six content tiles: 'Hacks' (a woman in a white dress), 'Pretty Little Liars: Summer School' (a group of women in swimwear), 'The Iron Claw' (three men in a field), 'Turtles All the Way Down' (two women), 'Silva + Restaurant' (a woman in a kitchen), and 'House of the Dragon' (a group of people in a dark setting). At the bottom right of the grid, it says 'Season 2 Premieres June 16'.</p> <p>Source: https://www.max.com</p>

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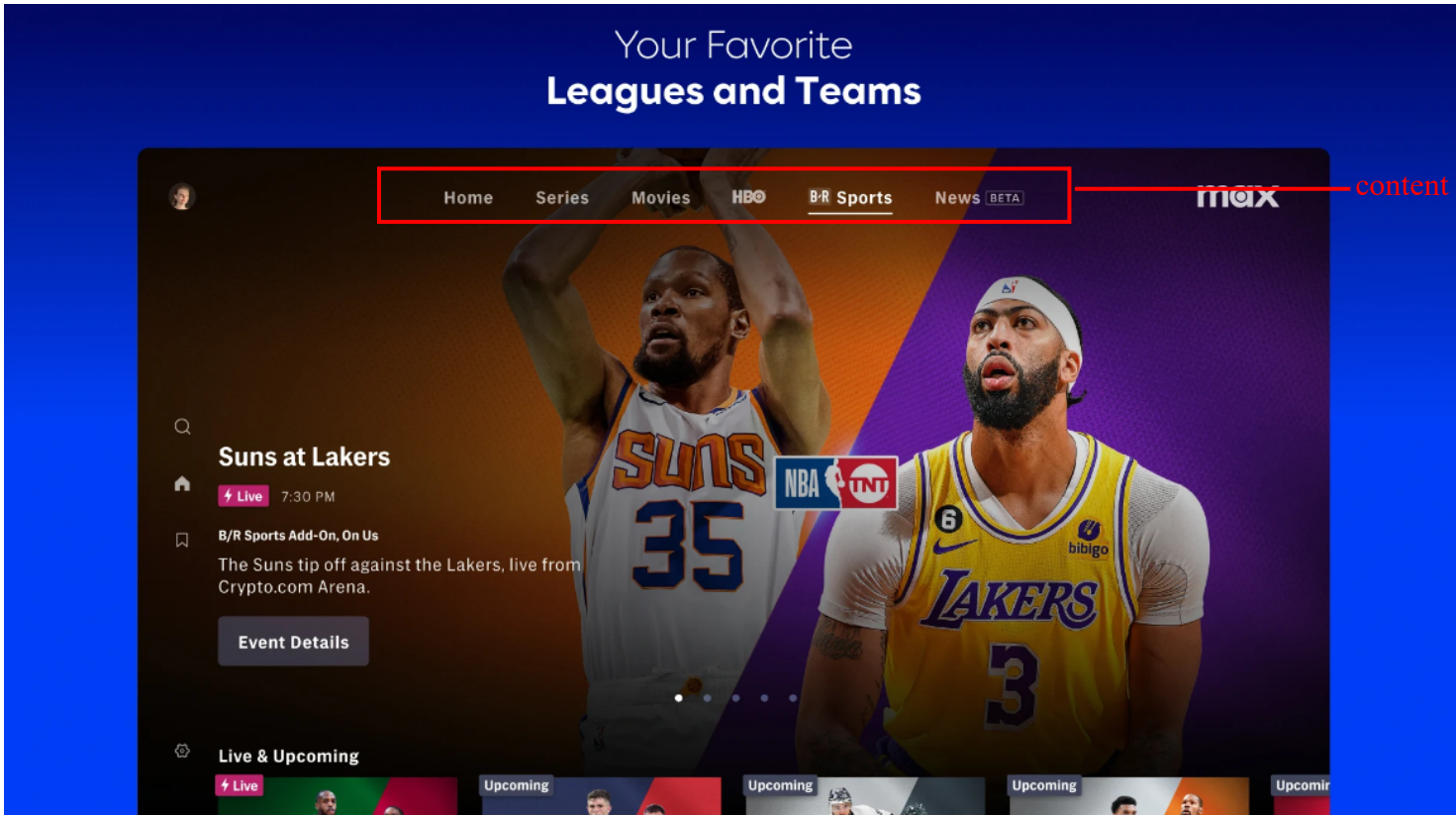
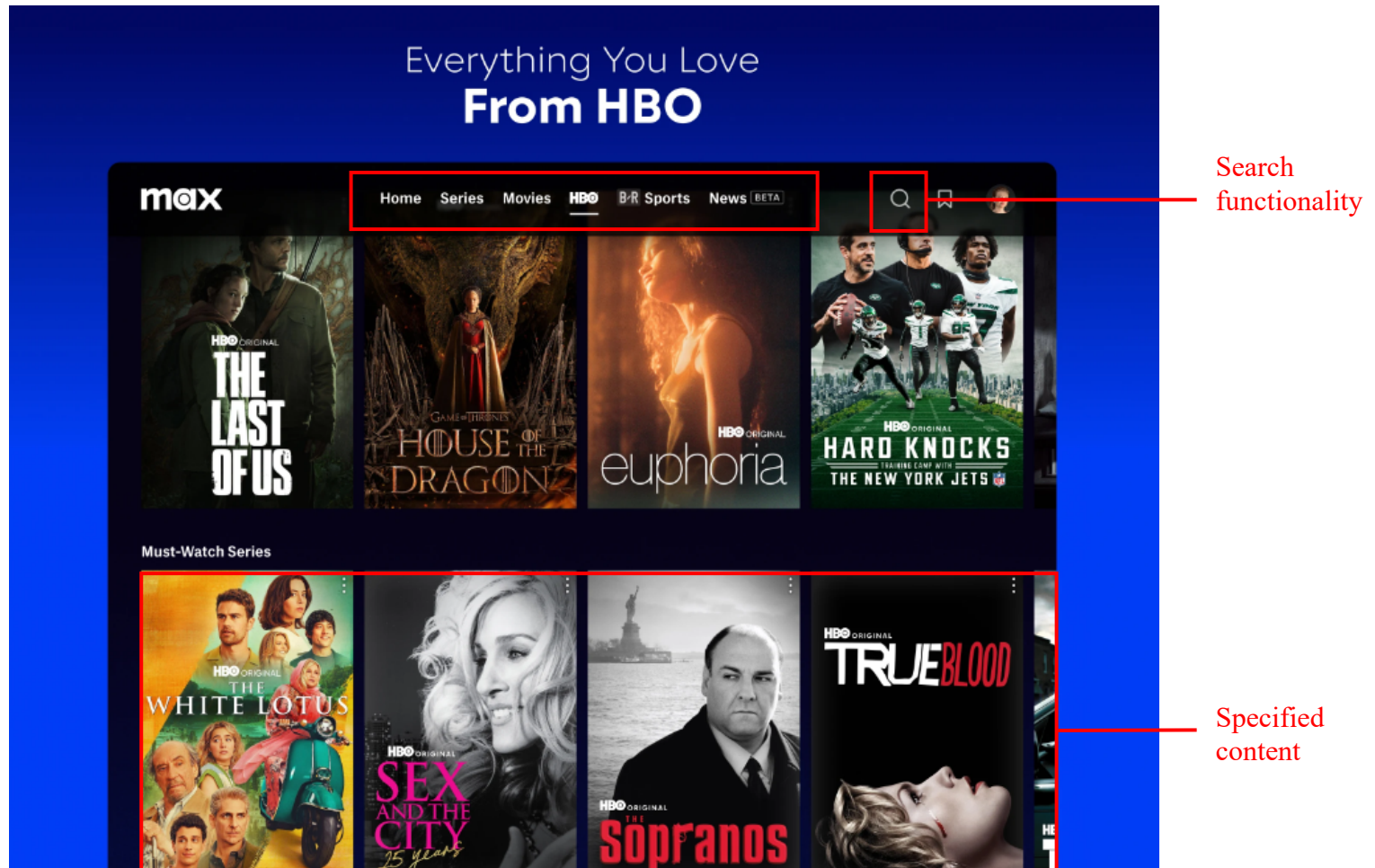
	 <p>Source: https://play.google.com/store/apps/details?id=com.wbd.stream&hl=en&gl=US (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[37.1] instructions for receiving a request from a client</p>	<p>Company provides instructions for receiving a request from a client for specified content.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

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for specified content;

For example, the Max platform presents various content options along with search functionality that allows users (“a client”) to select or search (“receiving a request from a client”) for the desired content (“specified content”).



Source: <https://play.google.com/store/apps/details?id=com.wbd.stream&hl=en&gl=US> (annotated)

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	<p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[37.2] instructions for communicati ng to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server; and</p>	<p>Company provides instructions for communicating to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Max platform utilizes the Amazon CloudFront content delivery network (CDN) to distribute the content through a network of geographically distributed servers to the users. When the user requests the desired content on HBO Max's mobile app/website, the request is routed to the edge location server or content provider ("a node server having the specified content stored thereon") where the content is stored. Further, the searched content is delivered to the user ("transmission of the specified content from the node server"). Since the content stored in the edge locations of the CDN is delivered to the user, upon information and belief, the platform comprises instructions to communicate the identity of the edge location server to the user, thereby, enabling the user to request transmission of the content.</p> <p></p> <p></p> <p>2022</p> <p>HBO Max, Warner Media's direct-to-consumer platform offering best-in-class quality entertainment, uses Amazon Web Services (AWS) to scale. In May 2020, HBO Max launched its platform and recently began its global rollout in 30 markets across Latin America and Europe. HBO Max uses an event-driven architecture, with security built in, to scale to serve 70 million global customers.</p> <p>Source: https://aws.amazon.com/solutions/case-studies/hbo-max-video/#:~:text=HBO%20Max%20Uses%20AWS%20Lambda%20to%20Scale%20Globally&text=HBO%20Max%20uses%20an%20event,serve%2070%20million%20global%20customers.</p>

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Amazon CloudFront is a web service that speeds up distribution of your static and dynamic web content, such as .html, .css, .js, and image files, to your users. CloudFront delivers your content through a worldwide network of data centers called **edge locations**. When a user requests content that you're serving with CloudFront, the request is routed to the edge location that provides the lowest latency (time delay), so that content is delivered with the best possible performance.

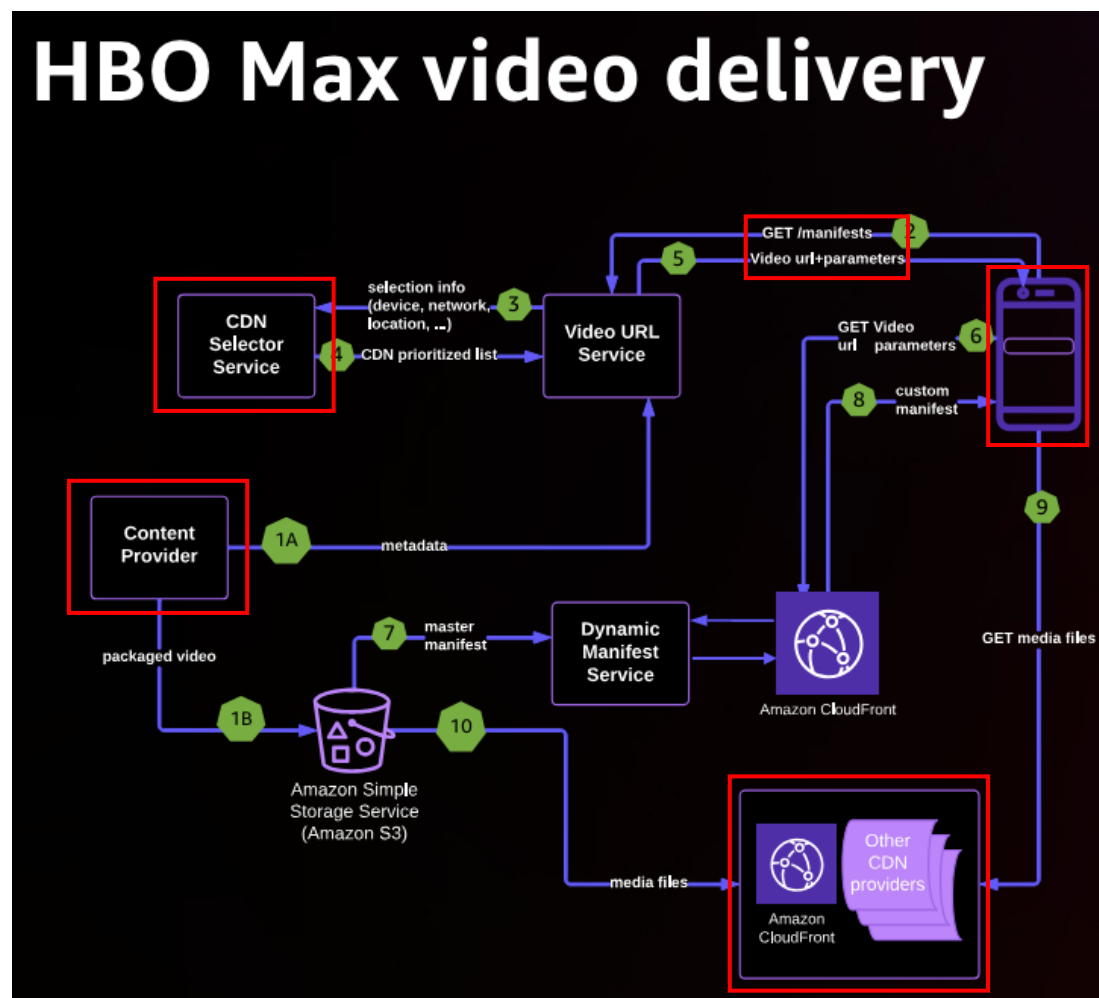
- If the content is already in the edge location with the lowest latency, CloudFront delivers it immediately.
- If the content is not in that edge location, CloudFront retrieves it from an origin that you've defined—such as an Amazon S3 bucket, a MediaPackage channel, or an HTTP server (for example, a web server) that you have identified as the source for the definitive version of your content.

Source: <https://docs.aws.amazon.com/AmazonCloudFront/latest/DeveloperGuide/Introduction.html>

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	<div><h2>HBO Max – Content delivery at scale</h2><h3>Multi-CDN strategy</h3><ul style="list-style-type: none">• Spikey traffic• Accelerated subscriber growth• Continued global expansion efforts<h3>Why Amazon CloudFront?</h3><ul style="list-style-type: none">• Global footprint• Increased / necessary capacity• Premium support / operational excellence<h3>Amazon CloudFront is a strategic partner</h3><ul style="list-style-type: none">• Grown to become one of the top performing CDNs used by HBO Max<p>Source: https://d1.awsstatic.com/events/Summits/reinvent2022/NET312_HBO-Max-achieves-scale-and-performance-with-Amazon-CloudFront.pdf, Page 16</p></div>
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Source: https://d1.awsstatic.com/events/Summits/reinvent2022/NET312_HBO-Max-achieves-scale-and-performance-with-Amazon-CloudFront.pdf, Page 18

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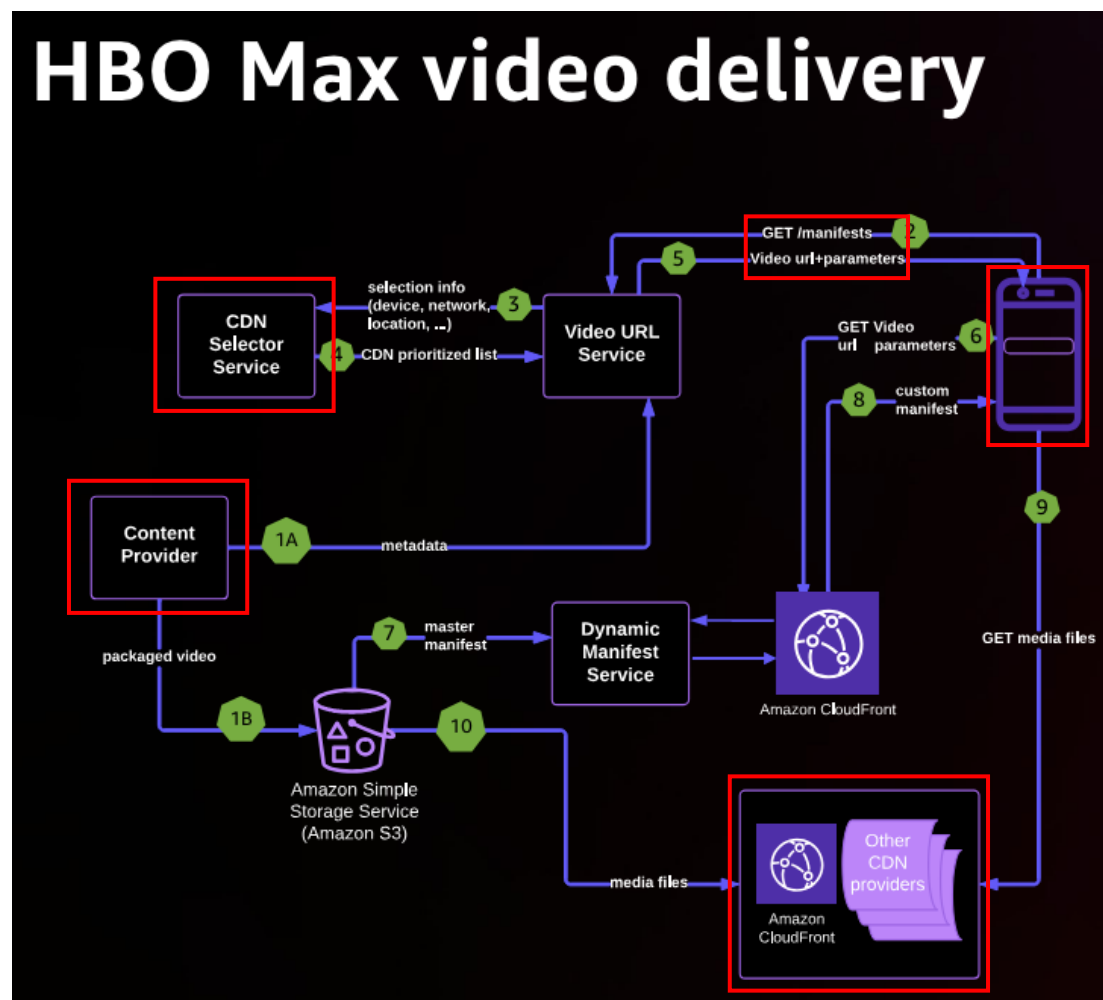
<p>[37.3] instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission of the specified content to the client.</p>	<p>Company provides instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for the transmission of the specified content to the client.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after identifying the edge location servers (or content providers) where the content is stored, the Max platform delivers the requested content to the user. Therefore, it would be apparent to a person having ordinary skill in the art that the HBO Max platform includes instructions to ensure that the content providers transmit the specified content to the users.</p> <p>Further, HBO Max provides multiple subscription plans for the user such that the user buys the plan and accesses the content available on the platform. Therefore, it would be apparent to a person having ordinary skill in the art that the owner of the node server receives an incentive as compensation for the transmission of the specified content to the client.</p> <div data-bbox="443 792 1289 1052">  <h2>HBO Max Uses AWS Lambda to Scale Globally</h2> <p>2022</p> <p>HBO Max, Warner Media's direct-to-consumer platform offering best-in-class quality entertainment, uses Amazon Web Services (AWS) to scale. In May 2020, HBO Max launched its platform and recently began its global rollout in 30 markets across Latin America and Europe. HBO Max uses an event-driven architecture, with security built in, to scale to serve 70 million global customers.</p> </div> <p>Source: https://aws.amazon.com/solutions/case-studies/hbo-max-video/#:~:text=HBO%20Max%20Uses%20AWS%20Lambda%20to%20Scale%20Globally&text=HBO%20Max%20uses%20an%20event,serve%2070%20million%20global%20customers.</p>
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- If the content is already in the edge location with the lowest latency, CloudFront delivers it immediately.
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Source: <https://docs.aws.amazon.com/AmazonCloudFront/latest/DeveloperGuide/Introduction.html>

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max Find Your Perfect Plan SIGN IN SIGN UP NOW

SAVE UP TO 20%

MONTHLY **YEARLY**

With Ads	Ad-Free	Ultimate Ad-Free
Watch with limited ads.	Watch on the go.	Watch on the go and in 4K.
<ul style="list-style-type: none"> ✓ Stream on 2 devices at once Full HD video resolution 	<ul style="list-style-type: none"> ✓ Stream on 2 devices at once Full HD video resolution 30 downloads to watch on the go 	<ul style="list-style-type: none"> ✓ Stream on 4 devices at once 4K Ultra HD video quality (as available) Dolby Atmos immersive audio (as available) 100 downloads to watch on the go
B-R Sports Add-On on us for a limited time	B-R Sports Add-On on us for a limited time	B-R Sports Add-On on us for a limited time
\$9.99/month SELECT PLAN	\$15.99/month SELECT PLAN	\$19.99/month SELECT PLAN

Source: <https://www.max.com>

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2. List of References

1. <https://www.max.com>, last accessed on May 16, 2024.
2. <https://help.max.com/US/Answer/Detail/000002506>, last accessed on May 16, 2024.
3. <https://aws.amazon.com/solutions/case-studies/hbo-max-video/#:~:text=HBO%20Max%20Uses%20AWS%20Lambda%20to%20Scale%20Globally&text=HBO%20Max%20uses%20an%20event,serve%2070%20million%20global%20customers>, last accessed on May 16, 2024.
4. <https://www.max.com>, last accessed on May 16, 2024.
5. <https://play.google.com/store/apps/details?id=com.wbd.stream&hl=en&gl=US>, last accessed on May 16, 2024.
6. <https://docs.aws.amazon.com/AmazonCloudFront/latest/DeveloperGuide/Introduction.html>, last accessed on May 16, 2024.
7. https://d1.awsstatic.com/events/Summits/reinvent2022/NET312_HBO-Max-achieves-scale-and-performance-with-Amaon-CloudFront.pdf, last accessed on May 16, 2024.